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9 *and LG Chem America, Inc.*

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **OAKLAND DIVISION**  
13

14 IN RE: LITHIUM ION BATTERIES  
15 ANTITRUST LITIGATION

Case No. 4:13-md-02420-YGR (DMR)  
MDL No. 2420

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17 This Document Relates to:  
18 INDIRECT PURCHASER ACTIONS  
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**UNOPPOSED ADMINISTRATIVE  
MOTION OF DEFENDANTS LG  
CHEM, LTD. AND LG CHEM  
AMERICA, INC. FOR LEAVE TO  
FILE A SUPPLEMENTAL  
MEMORANDUM IN SUPPORT OF  
IPPs' MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Before: Hon. Yvonne Gonzalez Rogers  
Courtroom: Courtroom 1, 4th Floor

Pursuant to Civil Local Rules 7-3(d) and 7-11, Defendants LG Chem, Ltd. and LG Chem America, Inc. (collectively, “LG Chem”) submit this administrative motion for leave to file a supplemental memorandum and exhibit in support of Indirect Purchaser Plaintiffs’ (“IPPs”) Motion for Preliminary Approval of Class Action Settlement with LG Chem (“Motion for Preliminary Approval”), ECF No. 1652.

At the hearing on the Motion for Preliminary Approval on February 28, 2017, the Court asked several questions about whether it could rule on final approval of the proposed settlement before ascertaining the number of class members who would make claims against the settlement fund. LG Chem therefore requests leave of the Court to file the attached Supplemental Memorandum of Law and the attached Exhibit A to the Supplemental Memorandum of Law, which address the Court’s questions.

Pursuant to Civil Local Rule 7-11(a), LG Chem and IPPs have entered into a stipulation pursuant to Civil Local Rule 7-12 that this administrative motion should be granted. Accordingly, LG Chem respectfully requests that the Court grant leave to file the attached Supplemental Memorandum of Law and Exhibit thereto.

Dated: March 9, 2017

EIMER STAHL LLP

By: /s/ Vanessa G. Jacobsen

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered as counsel of record in this action.

/s/ Vanessa G. Jacobsen

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